

7. VFC COMPLIANCE SITE VISITS

Overview

The CDC requires that the Montana Immunization Program periodically visit VFC providers to assess compliance with program requirements. These visits are called VFC compliance site visits or simply “site visits.”



The goal of the Montana Immunization Program is to ensure provider compliance through effective communication, and a site visit should be considered more of an educational opportunity than an “audit.” Most VFC Program compliance issues are addressed through education. Only cases of repeated and intentional non-compliance progress to advanced stages of corrective action. Please refer to Section 9 for more details on how non-compliance, fraud, and abuse are handled in the Montana VFC Program.

Self Assessment

We encourage you to continuously assess your VFC compliance, especially prior to your site visit, by using the checklist in Section 8 – VFC Program Requirements. This list details the main requirements of the VFC Program and references sections of this handbook for more information.

Site Visit Process

VFC providers in Montana can expect a site visit from the Montana Immunization Program **every other year**, typically in the spring, summer, or early fall.

VFC site visits are usually combined with another assessment function of the Montana Immunization Program—AFIX visits, where facility immunization rates are determined through chart reviews (AFIX procedures are not covered in this handbook). The general procedure for combined VFC/AFIX site visits is outlined below (AFIX-specific steps are indicated in parentheses.):

Site Visit Preparation

1. Approximately one month prior to your visit, a Montana Immunization Program staff member will contact you by telephone or email to schedule the visit.
2. After the visit is scheduled, you will receive a letter confirming the site visit date and requesting an active patient list (AFIX).

3. After reviewing your active patient list, the Immunization Program will fax or email you a list of charts that will be reviewed during your site visit (AFIX).

During the Site Visit

4. Site visits can take from 1 to 4 hours depending on the size of your clinic, the number of charts to review, and the educational opportunities that arise.
5. Please make the following available during the visit:
 - a. The vaccine manager and any key staff involved in the VFC Program
 - b. A work space large enough for a laptop computer and charts
 - c. Three months of temperature logs from your vaccine storage units (if not recorded twice daily in imMTrax)
 - d. Your completed and annually reviewed *Vaccine Management Plan*
 - e. VFC eligibility screening documentation (if not recorded in imMTrax)
 - f. Borrowing reports (if applicable)
 - g. Charts requested in Step 3 above (AFIX).
6. Approximately one hour of the site visit will be one-on-one with your vaccine manager. Immunization Program staff will ask questions pertaining to the practices at your facility for implementing the VFC Program. They will also inspect your vaccine storage units.
7. After the one-on-one with the vaccine manager, the Immunization Program staff can work independently as they review charts and enter data into their computer.
8. At the end of the visit, you will receive feedback on your compliance with the VFC Program and immunization coverage (AFIX) including areas of strength, areas for improvement, and any corrective actions.

Site Visit Follow-Up

9. Approximately one month after your site visit, you will receive a follow-up letter from the Immunization Program detailing the results of your VFC/AFIX visit. It will reiterate any VFC compliance issues and corrective action plans mentioned during your site visit.
10. In order to remain in good standing with the VFC Program, you are responsible for carrying out any corrective actions recommended by the Montana Immunization Program. Immunization Program staff may follow up by telephone and email.
11. Immunization Program staff may return to your facility for an educational site visit to address VFC non-compliance and AFIX issues.

Other Visits from the Montana Immunization Program

- **Educational Visits** – Educational visits are those where the main purpose is education and not assessing compliance.

- **Provider Request** – Providers may request an educational visit from the Montana Immunization Program at any time. Educational visits are useful when there has been a change in staff, location, or management. Education visits are dependent on availability of Immunization Program staff and can also be conducted by telephone or web conferencing.
- **Non-Compliance Response** – An educational visit may occur in response to provider non-compliance. The visit will focus on correcting the specific compliance issue.
- **Enrollment Visits** – Enrollment visits occur during the enrollment process, See Section 2 – Provider Enrollment for more information on VFC Program enrollment.